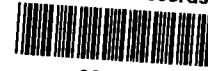




July 7, 2009

Mr. Steven J. Faryan  
U.S. EPA Region 5  
Emergency Response Branch  
77 W. Jackson Blvd.  
Chicago, IL 60604

EPA Region 5 Records Ctr.



385952

RE: Addendum to Removal Action Work Plan  
Elgin Salvage Yard – Jefferson Avenue Site  
20 Jefferson Avenue, Elgin, Illinois  
Terracon Project No. 11077052

Dear Mr. Faryan:

This letter will serve to provide a formal response to U.S. EPA's comments regarding the Removal Action Work Plan prepared by Terracon Consultants, Inc. (Terracon) on behalf of the City of Elgin for the above referenced site. The Work Plan was dated May 8, 2009 and your comments were provided in an e-mail dated May 12, 2009.

1. Sections 2.3, Page 7 – The concentrations of TCLP chromium referenced in the work plan were in units of milligrams per liter (mg/L).
2. Section 4.1, Page 9 – Based on the current poor condition of the drums and their unsafe stacking arrangement, the drums will be treated with extreme care during the drum inspection and initial stabilization process. Terracon's subcontractor, SET Environmental (SET), will perform the work as follows: The concrete floor around the drum pallets will be covered with oil dry and circumscribed with a boom. Using a boom lift, SET will inspect the contents of the drum. If the contents appear to be a metal powder, a small sample will be collected from the drum and an oil test will be conducted to confirm non-reactivity. The top layer of the drum will be covered with mineral oil to prevent dust from becoming airborne and to protect the contents from moisture. The top of the drums will be covered with plastic. The drums on the pallet will be braced together with two ratchet straps. The pallet will be placed on the drum staging area using a telescopic fork lift.

The drums will be staged on two layers of polyethylene on the concrete floor within the on-site open shed (toward the south end). Oil dry will be placed around the drums to absorb any leakage. Booms will be placed around the plastic to act as a temporary containment berm.

Due to heightened concern regarding the potential flammability and/or reactivity of the metal fines, SET will take further safety precautions to include:

- Notification of Elgin Fire Department in advance of the site activities;

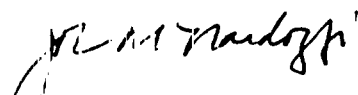


- Placement of a dump trailer of sand on-site and a skid steer to allow a drum that experiences an extreme reaction to be buried;
  - Placement of Type D fire extinguishers in accessible locations to control any smaller fires; and
  - Personnel moving or inspecting the drums and/or metal fines will use Kevlar turnout gear using Level C PPE and those collecting samples will use Kevlar suits, chemical gloves and Level C PPE.
3. Section 4.1 Page 9 – SET will provide a quad gas meter that will have sensors for oxygen (O<sub>2</sub>), hydrogen sulfide (H<sub>2</sub>S), lower explosive limit (LEL) and a photoionization detector (PID).
4. Section 4.4.1 – Laboratory Testing – We concur with your summary of the analytical work that will be performed to support the identification of the waste streams. Based on U.S. EPA's comments, the metal fines and magnesium turnings will be tested for flammability and reactivity. It is anticipated that the analytical testing will be performed by SET's forensic laboratory for unknown identification.
5. Section 4.2, Page 11 – Terracon has contacted U.S. EPA Region 6 to confirm the proposed disposal facility for the gas cylinders (SET's Houston TX EPA ID No. TXD055135388) is an acceptable disposal facility pursuant to the CERCLA off-site rule (300.440). Mr. Wilkin R. Shannon of U.S. EPA provided confirmation of this by e-mail on June 9, 2009 and indicated that the last inspection of this facility was conducted on 6/27/08.
6. Section 5.0 – Reporting – Terracon acknowledges that U.S. EPA will require documentation of the completion of the remedial action including copies of manifests, analytical reports, and waste profile sheets.

Our tentative schedule is to initiate the drum and cylinder testing and staging operation on July 13, 2009. The on-site work will require approximately three days and the laboratory testing will take approximately one week. Upon completion of the laboratory work and data evaluation, Terracon will issue a report of the Phase I activity that will include recommendations, costs and schedule for final off-site disposition of these materials.

Thank you for your assistance. If you require any further clarification of the above items, please feel free to contact us.

Sincerely,  
Terracon Consultants, Inc.

  
John M. Nardoizzi, P.E.  
Principal